

FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

DEC 13 2018
U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

THOMAS CARL CRIMMINS,

Defendant.

4:18CR1020 AGF/PLC

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term

(a) "minor" to mean any person under the age of eighteen years (18 U.S.C. §

2256(1));

(b) "sexually explicit conduct" to mean actual or simulated--

(i) sexual intercourse, including genital-genital, anal-genital, oral-genital,
oral-anal, whether between persons of the same or opposite sex,

(ii) bestiality,

(iii) masturbation,

(iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C.

§2256(2)(A));

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. § 2256(6));

(d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. § 2256(8)).

2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about August 1, 2017, and on or about September 21, 2017, in the Eastern District of Missouri, and elsewhere,

THOMAS CARL CRIMMINS,

the defendant herein, did knowingly employ, use, persuade, induce, entice, "JM," who was a minor, to engage in sexually explicit conduct, specifically, defendant recorded "JM" in a lascivious display of her genitals, engaging in oral sex, and engaged in sexual intercourse, and said sexually explicit conduct was for the purpose of producing visual depictions of such conduct, and such depictions were produced using an Apple iPhone;

In violation of Title 18, United States Code, Section 2251(a) and punishable under Title 18, United States Code, Section 2251(e).

COUNT II

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.

2. On or about September 21, 2017, in the Eastern District of Missouri, and elsewhere, the defendant herein, did knowingly transport an image of child pornography using any means or facility of interstate and foreign commerce, that is, the defendant transported the following graphic image file via the Internet which contained child pornography:

“IMG_0192.PNG,” a graphic image file that depicts defendant engaged in sexual intercourse with JM, a minor female;

In violation of Title 18, United States Code, Sections 2252A(a)(1).

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

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Assistant United States Attorney